



Representation Form

Local Plan Review: Preferred Approach Consultation

The consultation on the Local Plan Review: Preferred Approach will run from 13 December 2018 to 7 February 2019. The document and more information on the consultation can be viewed on our website www.chichester.gov.uk/localplanreview

All comments must be received by 11.59 pm on Thursday 7 February 2019.

There are a number of ways to make your comments:

- Comment on the document on the internet using our online consultation website www.chichester.gov.uk/localplanreview (**Recommended**)
- Complete this form on your computer and email it to us at planningpolicy@chichester.gov.uk
- Print this form and post it to us at: Planning Policy Team, Chichester District Council, East Pallant House, 1 East Pallant, Chichester, West Sussex, PO19 1TY

How to use this form

Please complete Part A in full. Please note anonymous comments cannot be accepted, a full address including postcode must be provided.

Please complete Part B overleaf, using a new form for each separate policy or paragraph that you wish to comment on. Please identify which paragraph your comment relates to by completing the appropriate box.

For more information, or if you need assistance completing this form, please contact the Planning Policy Team by email at planningpolicy@chichester.gov.uk or telephone 01243 785166.

PART A	Your Details	Agent's Details (if applicable ¹)
Full Name	Sarah Heron	Chris Hough
Address	Rydon Homes Rydon House Station Road Forest Row East Sussex	Sigma Planning Services 6, Garden Street Tunbridge Wells Kent
Postcode	RH18 5DW	TN1 2XB
Telephone	0203 9461117	
Email	sheron@rydon.co.uk	
Organisation (if applicable)	Rydon Homes Ltd	
Position (if applicable)		

Is this the official view of the organisation named above? Yes No

PART B

Please use a new form for each representation that you wish to make. Please note anonymous comments cannot be accepted. Any personal information provided will be processed by Chichester District Council in line with the General Data Protection Regulations 2018. More information is available at: <http://www.chichester.gov.uk/dataprotectionandfreedomofinformation>.

To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	Policy S4
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Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support

Object

Have Comments

Enter your full representation here giving details of your reasons for support/objection:

The currently adopted Local Plan 2014-29 identified an Objectively Assessed Need of 575 dwellings (2012 based projections) per annum for the district as a whole, including the South Down National Park, which it assumed would deliver 70 units (1,050 over the plan period) resulting in an OAN of 505 or 7,575 over the plan period.

However, due to uncertainties and lack of evidence about highways and waste water treatment capacity the Local Plan proposed to undershoot the OAN figure.

The Inspector found the basis of the plan 'sound', despite the shortfall to meet the OAN of 1,425 over the plan period solely on the commitment that the Council commenced an immediate review to enable them to undertake additional highway and wastewater capacity investigations to endeavour to conclude a solution to assist the delivery of the full OAN.

The emerging Local Plan is based on the CLG 2014-based Household Projections which are the starting point for considering housing need. These projections were underpinned by the 2014-based Subnational Population Projections (SNPP). For Chichester the 2014-SNPP set out a population growth for the 10-years between 2016 and 2026 of 8,200 people (820 per annum). Translating these in to household growth using the methodology as set out in the "Planning for the right homes in the right places" consultation document the 2014-based Household Projections show a household growth of 5,164 (517 households per annum).

The GL Hearn Chichester Housing and Economic Development Needs Assessment that accompanies the Local Plan leads on to conclude that based on the adjustments required for affordability in the district the OAN is actually recommended at **775 dpa** over the plan period this results in a OAN of 14,725.

This does include the areas of the district that are within the SPNP, who are currently out for consultation on its Main Modifications following the examination of its plan in 2018. However, this plan identifies an OAN of 447 dpa (which is skewed as it does not take account of any uplift for affordability or even zero employment growth), yet due to its role of

a National Park only identifies a housing target of 250 dpa some 3,743 dwellings short of its OAN over the life period of the plan.

The final stage of the "Planning for the right homes in the right places" proposed methodology caps the OAN to a level which is deliverable.

Paragraph 25 of the proposed methodology paper sets out the parameters of this cap setting out that:

a) for those authorities that have adopted their local plan in the last five years, we propose that their new annual local housing need figure should be capped at 40 per cent above the annual requirement figure currently set out in their local plan; or

b) for those authorities that do not have an up-to-date local plan (i.e. adopted over five years ago), we propose that the new annual local housing need figure should be capped at 40 per cent above whichever is higher of the projected household growth for their area over the plan period (using Office for National Statistics' household projections), or the annual housing requirement figure currently set out in their local plan.

The Chichester Local Plan was adopted in July 2015, consequently under the current methodology the OAN can be capped at 40% above the adopted housing requirement up until July 2020. The Local Plan was adopted on the basis of approximately 435 homes per year (excluding the SDNP), consequently this results in an OAN of only 609 dwellings per annum for the plan area.

Para 11 b of the NPPF (2018) states that:

"Plans and decisions should apply a presumption in favour of sustainable development. For **plan –making** this means:

- a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adopt to rapid change;
- b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met with neighbouring areas, unless:
 - i. The application of policies in this Framework that protect areas of assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area or;
 - ii. Any adverse impacts in doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework as a whole.

It is clear that national guidance seeks to significantly boost the supply of housing. While it is recognised that the Council is following a draft methodology published by the Government, it is fundamentally flawed and inconsistent with Government Guidance, that despite the Council determining that its OAN is 775 (although noting that this includes the SDNP) it caps this to 609 (excluding the SDNP) as it has taken the draft methodology capping literally. In doing so the council has failed to take account of:

- The fact its current plan target is 70 dpa lower than its OAN and that it was only found sound on the basis of an early review to ensure the district addressed the shortfall in the short to medium term.
- The reality that the 70 dpa per annum that it assumed that the SDNP would accommodate to assist the Council in meeting its OAN for the district as a whole isn't being met as the SDNP is only meeting 55% of its own needs.

- The point in time that the new plan will be adopted, which according to the Council LDS is likely to be after the existing plan is over 5 years old.

Para 4.22 of the Local Plan states "This Plan seeks to make provision for an additional 12,350 dwellings to be delivered during the period 2016-2035 in accordance with the findings of the Chichester Housing and Economic Development Needs Assessment (HEDNA). This reflects the identified objectively assessed housing needs of the plan area, plus an allowance for accommodating unmet need arising from the Chichester District part of the South Downs National Park".

The Council has tested 3 scenarios in its Sustainability Appraisal (SA) and evidence base, to include 650 dpa, 800 and 1000.

Under the summary of effects Para 4.3.1 option 1 650 dpa the SA concludes:

"The primary benefits of this option are economic – by meeting the objectively assessed need (plus the unmet need from the SDNPA in Chichester District) this option should deliver housing to support economic growth to mitigate the dip in population (1% loss over 5 years, ONS) in the plan area amongst the working age population and to deliver a proportion of affordable housing in comparison to the existing adopted local plan".

However, the plan does not reflect the identified needs of the plan plus unmet need for the SDNP as this would be more in line with the 775 dpa figure determined in the GL Hearn report prior to any capping, adversely the 40% cap has effectively allowed Chichester to continue with a Local Plan that will not adequately deal with the OAN. Consequently, the district will fail to see the scale of uplift they would see if the cap was not applied and it will fail to address the market signals and meet the need for affordable housing which does not reflect the PPG on these two factors.

Under the summary of effects Para 4.3.2 Option 2 800 dpa the SA concludes:

"This option increases the likelihood of negative impacts on biodiversity and on landscape and urban forms / townscape as the land required at each settlement will be greater. Therefore it will be harder to avoid those sites with the greater impacts or to leave the more sensitive parts of those sites undeveloped. The transport and air quality impacts are still capable of mitigation and no additional exceedances of air quality are predicted from modelling work. However additional waste water treatment capacity is very likely to be required, which would delay delivery of housing. The space available within sites for SUDS, green infrastructure and other benefits is likely to diminish. Positive impacts include greater potential for low and zero carbon technologies on large sites, higher levels of affordable housing and other economic benefits".

Rydon has undertaken its own SA see attachment. It is considered that the Council has incorrectly assessed the impacts of 800 dpa and should reassess these based on Rydon's comments. In summary the HELAA identifies a total number of sites suitable to accommodate in the region of 7917 within the district as a whole. These sites would have been through a testing process to assess the suitability and should have taken account of the Council's SA objectives. It is therefore considered that the District is able to meet its full OAN of 775, as tested under option 2 and as such, in line with the government agenda to significantly boost housing supply should not cap the plan figure at no more than 40% above the adopted LP under the proposed new methodology.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

As the Local Plan Review will not be adopted before the current plan is over 5 years old and the HELAA has demonstrated that there is scope for higher levels of housebuilding the 40% cap should not be used. Under- provision in the SDNP should be made up in the remaining part of the District and the OAN housing figure should be met in full.

(Continue on separate sheet if necessary)

Declaration

I understand that any comments submitted will be considered by Chichester District Council in line with this consultation and will be made publicly available on their website www.chichester.gov.uk and may be identifiable by my name or organisation, if provided.

Name (<i>print</i>):	SIGMA PLANNING SERVICES
Date:	7 TH FEBRUARY 2019